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**M C N A I R**  
ATTORNEYS

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October 15, 2013

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Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: Annual ETC Reports: Information Required to be Filed in  
WC Docket No. 10-90 with the FCC, USAC, and State  
Commissions pursuant to 47 C.F.R. §§ 54.313 and 54.422

Dear Ms. Boyd:

Enclosed for filing on behalf of the South Carolina Telephone Coalition companies and affiliated eligible telecommunications carriers ("ETCs") (see attached list), please find a copy of FCC Form 481 and accompanying information. The attached information is also provided to the Commission on the enclosed CD-ROM. Federal Communications Commission ("FCC") regulations require all ETCs who receive federal high cost or low income support to file reports containing this information on an annual basis ("Annual ETC Reports") with the FCC, the Administrator of the Universal Service Administrative Company ("USAC"), and the relevant state commission.<sup>1</sup> See 47 C.F.R. § 54.313(i); § 54.422(c).

These Annual ETC Reports are being filed with the FCC and USAC for review in connection with the federal Connect America Fund. While the FCC rules state that a copy must be provided to the state commission, the Commission is not required or asked to take any action at this time. Therefore, we are providing these reports for information purposes only.

Please note that these Annual ETC Reports contain confidential information regarding the companies' finances, operations, service outages, and customer service issues. A motion for confidential treatment of these materials accompanies this filing. A public redacted version of the filing is attached. A

<sup>1</sup> Rock Hill Telephone Company was also required to file a copy with the relevant Tribal authority, which it has done.

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Page 2

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ATTORNEYS

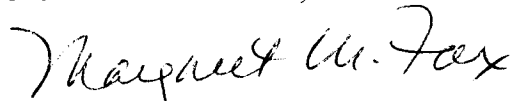
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confidential version is being provided to the Commission in a sealed envelope, in accordance with the Commission's procedures.

Thank you for your assistance. If you should have any questions, please do not hesitate to contact me.

Very truly yours,

McNAIR LAW FIRM, P.A



Margaret M. Fox

MMF:rwm  
Enclosures

## South Carolina Telephone Coalition Member Companies and Affiliated ETCs

<b><u>Eligible Telecommunications Carrier</u></b>	<b><u>Study Area Code (SAC)</u></b>
Bluffton Telephone Company, Inc.	240512
Chesnee Telephone Company	240515
Chester Telephone Company d/b/a TruVista	240516
Farmers Telephone Cooperative, Inc.	240520
FTC Communications, LLC†	249002
Ft. Mill Telephone Company d/b/a Comporium	240521
Hargray Telephone Company, Inc.	240523
Home Telephone ILEC, LLC d/b/a Home Telecom	240527
Horry Telephone Cooperative, Inc.	240528
Horry Tel. Coop. f/k/a HTC Communications, LLC†	249004
Lancaster Telephone Company d/b/a Comporium	240531
Lockhart Telephone Company d/b/a TruVista	240532
McClellanville Telephone Company (TDS) †††	240533
Norway Telephone Company (TDS) †††	240535
Palmetto Rural Telephone Cooperative, Inc.	240536
Palmetto Telephone Communications, LLC (Lifeline only)††	249023
Piedmont Rural Telephone Cooperative, Inc.	240538
PBT Telecom d/b/a Comporium	240539
Ridgeway Telephone Company d/b/a TruVista	240541
Rock Hill Telephone Company d/b/a Comporium	240542
Sandhill Telephone Cooperative, Inc.	240546
St. Stephen Telephone Company (TDS) †††	240544
West Carolina Rural Telephone Cooperative, Inc.	240550
Williston Telephone Company (TDS) †††	240551

† Wireless competitive ETC

†† Lifeline only ETC

††† Public company

All other companies are privately held rate-of-return carriers

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA

Re:   Annual ETC Reports: Information Required to be Filed       )  
      in WC Docket No. 10-90 with the FCC, USAC, and State    )  
      Commissions pursuant to 47 C.F.R. §§ 54.313 and 54.422    )  
\_\_\_\_\_)

**MOTION REQUESTING THAT MATERIALS BE TREATED AS CONFIDENTIAL**

The South Carolina Telephone Coalition (see attached list of companies) (“SCTC”) respectfully requests that the South Carolina Public Service Commission (“Commission”) treat the materials accompanying this motion as confidential. This motion is made on the following grounds:

1.     Eligible Telecommunications Carriers (“ETCs”) who receive federal high cost or low income support are required to file annual reports (“Annual ETC Reports”) pursuant to 47 C.F.R. §§ 54.313 and 54.422 with the Federal Communications Commission (“FCC”), the Universal Service Administrative Company (“USAC”), and the relevant state commissions or Tribal governments, as appropriate. *See* 47 C.F.R. § 54.313(i); § 54.422(c). The Annual ETC Reports are required to be filed on FCC Form 481, with attached materials.

2.     The Annual ETC Reports for certain companies include detailed information on reported outages the ETC experienced in the prior calendar year, as required by 47 C.F.R. § 54.313(a)(2). This information is entitled to confidential treatment pursuant to 47 C.F.R. §§ 4.2 and 0.457(d)(vi), and Commission Order No. 2006-777 in Docket No. 2006-371-C.

3. The Annual ETC Reports for the privately-held rate of return companies (see attached list) include full and complete annual reports of the companies' financial condition and operations as of the end of the preceding fiscal year, as required by 47 C.F.R. § 54.313(f)(2). The FCC has recognized that there is a potential for competitors to use the submitted financial data of private rural rate-of-return carriers in an anticompetitive manner, and has allowed privately held ETCs to file the required financial data subject to a Protective Order. *See Connect America Fund et al.*, WC Docket No. 10-90 et al., Fifth Order on Reconsideration, at para. 15 (rel. November 16, 2012); Protective Order, DA 12-1857 (Wireline Comp. Bureau, rel. November 16, 2012). For the same reason cited by the FCC, the companies' detailed financial information is entitled to protection as confidential information at the state level. This information contains confidential, proprietary, competitively-sensitive business and financial information which, if disclosed, would cause competitive harm to the companies. Protection of such confidential and proprietary information is consistent with Commission precedent.

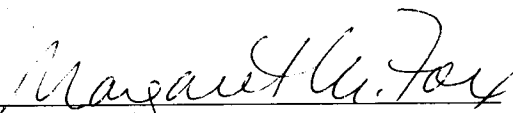
4. The Annual ETC Reports for McClellanville Telephone Company, Norway Telephone Company, St. Stephen Telephone Company, and Williston Telephone Company include information regarding the number of service outages, unfulfilled service requests, and consumer complaints that are considered confidential and proprietary to the companies. The companies have filed this information with the FCC on a confidential basis pursuant to 47 C.F.R. § 0.457(d) on the grounds that the information is competitively sensitive and not routinely available for public inspection. This information is confidential, proprietary, competitively-sensitive business information which, if disclosed, would cause competitive harm to the companies.

5. We ask that the materials described above be afforded confidential treatment by the Commission. In accordance with the Commission's guidelines, as set forth in Commission Order No. 2005-226, "Order Requiring Designation of Confidential Materials," the accompanying confidential materials are being filed in a separate envelope, which is clearly marked "Confidential." Each confidential page of the materials is clearly marked "Confidential." We are also providing a public redacted version of the filing.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that the Commission treat the accompanying materials as confidential, for the reasons stated herein.

Respectfully submitted,

McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

By:   
M. John Bowen, Jr.  
Margaret M. Fox

ATTORNEYS FOR THE SOUTH CAROLINA  
TELEPHONE COALITION

Columbia, South Carolina  
October 15, 2013

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